

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Wanda Perez-Arjona	:	Chapter 13
	:	
Debtor	:	Case No.: 18-12382MDC

**MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND
CLEAR OF LIENS AND ENCUMBRANCES**

NOW INTO COURT COMES, Wanda Perez-Arjona, hereinafter referred to as “Debtor”, brings this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof avers the following:

1. Debtor, commenced the case on April 10th, 2018 by filing a Voluntary Petition for relief under Chapter 13 of the Bankruptcy Code.
2. The Debtor’s property is located at 810 Highland Avenue, Bensalem PA, 19020 (hereinafter referred to as “the property”).
3. Debtor believes it to be in her best financial interest to sell the property.
4. In furtherance of the sale, the Debtor retained the assistance of Pamela Galster, a duly licensed realtor with Sovereign Home Realty.
5. On or about January 12th, 2019, Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$205,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled “**Exhibit A.**”

6. The Debtor and her non-filing spouse are the sole owners of the property.
7. Steven Kopchinski ("the Buyer"), is not an insider of the Debtor's, and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.
8. As of December 27, 2018, the Debtor owed \$171,341.41 to Beneficial Bank. A true and correct copy of the Payoff Statement is attached hereto and labeled "**Exhibit B.**"
9. The Debtor intends to satisfy her first mortgage lien owed to Beneficial Bank in full at the time of closing.
10. From the sale, the Debtor estimates that there will be proceeds totaling approximately \$28,609.00 due to the Debtor.
11. The Debtor shall submit all of the proceeds realized from the sale of the property to the Chapter 13 Trustee, in order to pay down the balance of her Confirmed 100% Plan.
12. Said proceeds from the sale will be directly forwarded to the Trustee by the Title Agent at the time of closing of the sale of the property.
13. The Debtor by and through her Title Agent shall additionally forward to the Trustee the final HUD-1 or settlement documentation at the time of closing.

WHEREFORE, Debtor, respectfully request that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyerS under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances and (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: January 24, 2019

/s/Brad J. Sadek, Esq.

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